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10 The Honorable Robert S. Lasnik

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15 UNITED STATES DISTRICT COURT
16 WESTERN DISTRICT OF WASHINGTON

17 Firs Home Owners Association,

18 Plaintiff,

19 v.

20 City of SeaTac, a Municipal Corporation,

21 Defendant.

22 NO. 2:19-cv-01130-RSL

23 DECLARATION OF JONG PARK

24 Pursuant to 28 U.S.C. § 1746, I, JONG PARK, state and declare under penalty of
25 perjury as follows:

26 1. I am the president of Fife Motel, Inc. ("Fife Motel"). This declaration is
27 based on my own personal knowledge.

28 2. Fife Motel owns property at 20440 International Boulevard in SeaTac,
29 Washington, commonly known as the Firs Mobile Home Park. In early 2016, Fife Motel
30 began the process of closing the Firs Mobile Home Park in order to convert the property to
other commercial uses.

31 3. Starting in 2016 and through early 2018, I had some discussions with people
32 purporting to represent residents of the Firs Mobile Home Park about whether Fife Motel
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34 DECLARATION OF JONG PARK –
35 NO. 2:19-cv-01130-RSL - 1

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might be willing to sell the property. I recall some discussion about a \$6 million dollar offer, but I never received a formal written offer from anyone to purchase the property.

4. Discussions about selling the Firs Mobile Home Park property did not go anywhere because the property was not for sale and it was never the intention of Fife Motel to sell the property. In any event, the property was worth far more than \$6 million.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing declaration is true and correct.

DATED THIS 24th day of February, 2021, at SeaTac, Washington.

JONG PARK

DECLARATION OF JONG PARK –
NO. 2:19-cv-01130-RSL - 2

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3 CERTIFICATE OF SERVICE
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5 I hereby certify that on March 4, 2021, I filed the foregoing with the Clerk of the
6 Court using the CM/ECF System, which will send notification of such filing to the
7 following:

8 V. Omar Barraza omar@barrazalaw.com
9 Christina L. Henry chenry@hdm-legal.com
Mary E. Mirante Bartolo mmbartolo@seatacwa.gov
10 Mark S. Johnsen mjohnsen@seatacwa.gov
Brendan W. Donckers bdonckers@bjtlegal.com

11 and I hereby certify that I have mailed by United States Postal Service the document to the
12 following non-CM/ECF participants:
13

14 None.

15 s/ QUINN N. PLANT
16 WSBA #31339
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Attorneys for Defendant
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28 DECLARATION OF JONG PARK –
29 NO. 2:19-cv-01130-RSL - 3

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